

APR 2010
Room**Annual 47 C.F.R.S: 64.2009(e) CPNI Certification**
EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2009

Date filed: **February 20, 2010**Name of Company covered by this certification: **88 Telecom Corporation**Form 499 filer ID: **825362**Name of Signatory: **Alice Ou**Title of Signatory: **Manager**

I, **Alice Ou**, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that adequate to ensure compliance with the Commission's CPNI rules. See 47 C.F. R. S:64.2001 et seq.

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the Commission's set forth in section 64.2001 et seq. of the Commission's rules.

The company has taken actions to against data brokers in the past year:

1. 88 Telecom did not sell, lease or otherwise distribute customers' names or usernames to third parties. Information collected from our customers will not be shared with, nor divulged to, any other party, unless required by court order to subpoenaed by a law enforcement agency.
2. 88 Telecom did not use a customer's information for marketing services to customers that are outside of the category of service to which the customer has not already subscribed. 88 Telecom does not share CPNI with affiliates or third parties for marketing purposes.
3. 88 Telecom may engage third parties to assist in billing and collections, administration, surveys, marketing, service delivery and customization, maintenance and operations, and fraud prevention.
4. If 88 Telecom seeked to promote services to customers outside of the category of services to which customer subscribes, then 88 Telecom would notify customer at that time of their right to choose not to be a part of any such marketing campaign.
5. All marketing campaigns must receive prior approval and must be conducted in accordance with the CPNI policy.

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6. All 88 Telecom employees have been trained as when they are, and are not, authorized to use CPNI. 88 Telecom will take any necessary disciplinary action to prevent violation of this policy.
7. 88 Telecom had a corporate officer who acts as agent for the company and signs a compliance certificate on an annual basis stating that the officer has personal knowledge that the company has maintained operating procedures that are adequate to ensure compliance with applicable CPNI rules. 88 Telecom provides a statement that accompanies this certificate verifying the compliance.

The company has not received any customer complaints in the past year concerning any breach activities of CPNI.

Signature: Alain G. G.

Title: Manager

2/20/2010

CPNI Rules Compliance Statement

Date: February 20, 2010

From: 88 Telecom Corporation
2525 Van Ness Ave. #222
San Francisco, CA 94109

To: Federal Communications Commission
445 12th St., Suite TW-A325
Washington, DC 20554

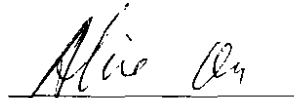
ATTN: the Commission's Secretary/ Marlene H. Dortch

To Whom It May Concern:

I have examined all the procedures, documents, files and records of 88 Telecom Corporation as required under the FCC's CPNI Rules, 47 C.F.R : 64.2009(e). In my understanding and to the best of my knowledge, according to the examination carried out by me and the explanation furnished to me by 88 Telecom's officers and agents, I hereby certify that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules, in respect of the aforesaid calendar year 2009.

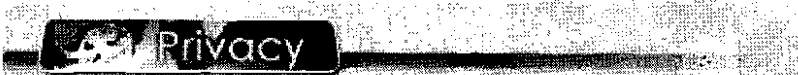
Respectfully submitted 2525 Van Ness Ave. #222, San Francisco, CA 94109 by,

Alice Ou/ Office Manager of 88 Telecom



Signature of Agent

Date: 2/20/2010



Privacy on this site

<http://www.88card.com/privacy.asp>

for 2009

What personally identifiable information is collected on this site?

Visitors may supply personally identifiable information (such as name, address or telephone numbers) for various purposes on this site. These purposes include registering to receive e-mail newsletters, requesting further information about our products, or simply asking a question about 88card.com. We do not collect personal information from you unless you provide it to us. This means that you can visit our site without telling us who you are or revealing any personally identifiable information about yourself.

How is it used?

88 Telecom is committed to protecting the privacy of its customers. We do not sell, lease or otherwise distribute customer names or usernames to third parties. Information you give us will not be shared with, nor divulged to, any other party, unless required by court order or subpoenaed by a law enforcement agency.

When you supply information about yourself for a specific purpose, we use the information for only that purpose (such as to provide the service or information you have requested). For example, you may be asked to give us individual information to receive information, manage online services, or apply for a job.

Should any material changes be made to the ways in which we use personally identifiable information, we will take commercially reasonable measures to obtain e-mail consent from you. We will also post the changes to our use of personally identifiable information on our site at least 30 days prior to a change.

Security

Personally identifiable information is stored on our Web server and is not publicly accessible. Further, personally identifiable information is only accessed by our employees on a "need to know" basis. All our employees must go through privacy training upon starting with us. We meet or exceed all industry standards for the protection of personally identifiable information.

Please note: When you order a card online and enter your payment information, you can't access it right away. We have to call you back to verify your information before we activate the pin. That is for your protection.

We can't release call detail information based on customer-initiated telephone contact, except one of the conditions has been met: (1) When a customer provides a pre-established password; (2) when a customer requests that the information be sent to his/her address of record; or (3) when we call the telephone number of record and discloses the information.

Choice/Opt-out

If you have registered to receive e-mail communications from us and later change your mind, you may contact us to have your name removed from our distribution lists. You can send an e-mail to support@88card.com or mail us at: 2525 Van Ness Ave. #222, San Francisco, CA 94109.

Correct/Update

If you would like to verify the data we have received from you or to make corrections to it, you may contact us either by e-mail or mail address provided above.

Does this site use cookies?

88card.com does not use cookies.

Links

This site may contain links to other Web sites. Please note that when you click on one of these links, you are entering another site. We encourage you to read the privacy statements of these linked sites as their privacy policy may differ from ours.

E-mail Links

We use e-mail links located on this site to allow you to contact us directly via e-mail. We use the information provided in your e-mail to respond to your questions or comments. We may also store your comments for future reference. Your personal information is only shared with third parties with your explicit permission.

Legal Disclaimer

We may disclose personal information when required by law or in the good-faith belief that such action is necessary in order to conform to the edicts of the law or comply with legal process served on 88card.com.

Customer Proprietary Network Information Policy

Federal law governs the use of Customer Proprietary Network Information ("CPNI"). 88 Telecom uses CPNI in accordance with federal law and as stated in this policy.

Federal law defines CPNI as:

The individually identifiable information that is created by a customer's relationship with a communications provider, such as data about the frequency, duration and timing of calls, the information on a customer's bill and call-identifying information.

For example, CPNI includes information such as the type of services that the customer subscribes to and the customer's use of those services (e.g., call patterns, call volume, etc.). CPNI does not include information derived from non-telecommunications services offered to the customer. Under federal law, absent customer consent, 88 Telecom is permitted to use, disclose, or permit access to CPNI as follows:

- (1) to protect our rights and property, our customers, and other carriers from fraudulent, abusive, or unlawful use of, or subscription to, our services;
- (2) to provide or market service offerings among the categories of service to which the customer already subscribes;
- (3) for the provision of customer premises equipment;
- (4) for billing and rendering services to the customer; and
- (5) as required by law, such as in response to a validly issued subpoena.

88 Telecom does not use CPNI to market services to customers that are outside of the category of service to which the customer does not already subscribe. 88 Telecom does not share CPNI with affiliates or third parties for marketing purposes. 88 Telecom may engage third parties to assist in billing and collections, administration, surveys, marketing, service delivery and customization, maintenance and operations, and fraud prevention. If 88 Telecom seeks to market services to customers outside of the category of services to which the customer subscribes, then 88 Telecom will notify customer at that time of their right to choose not to be a part of any such marketing campaign. All marketing campaigns must receive prior approval and must be conducted in accordance with this policy.

All employees will be trained as to when they are, and are not, authorized to use CPNI. 88 Telecom will take any necessary disciplinary action for violation of this policy.

88 Telecom has a corporate officer who acts as agent for the company and signs a compliance certificate on an annual basis stating that the officer has personal knowledge that the company has established operating procedures that are adequate to ensure compliance with applicable CPNI rules. 88 Telecom provides a statement that accompanies this certificate explaining that its operating procedures are adequate to ensure compliance with CPNI regulations.

For more information

If you have any questions, concerns or comments, please e-mail support@88card.com.